

Milione, Shawn (USANYS) [Contractor]

From: Jepal, Vinay
Sent: Monday, June 20, 2011 1:35 PM
To: ofac_feedback@do.treas.gov
Cc: CBNA Sanctions
Subject: Emailing: Stratus International Contracting - Final
Attachments: Stratus International Contracting - Final.pdf

Importance: High
Sensitivity: Confidential

Attn: OFAC Compliance @ US Treasury

We like to share the attached information with the OFAC.

While performing the Transaction Review on an alert generated by our Transaction Surveillance system, we noted that one of the party to the transaction may be an Iranian or an Iranian Origin.

Please review the attached letter and the documents. If you have any questions or require any additional details, please let us know.

Thanks & regards,
Vinay Jepal

Commerzbank AG
Sanctions Compliance Officer
New York, NY 10281-1050

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Commerzbank Aktiengesellschaft, Frankfurt am Main Handelsregister/Commercial Register: Amtsgericht Frankfurt am Main, HRB 32000 Vorsitzender des Aufsichtsrates/Chairman of the Supervisory Board: Klaus-Peter Müller
Vorstand/Board of Managing Directors: Martin Blessing (Vorsitzender/Chairman), Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges, Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

The message is ready to be sent with the following file or link attachments:

Stratus International Contracting - Final

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



NEW YORK BRANCH

Department of the Treasury
Office of Foreign Assets Control
1500 Pennsylvania Avenue NW
Washington DC 20220

Vinay Jepak
2 World Financial Center, New York, NY 10281-1050
Telephone (212) 266-7200
Fax (212) 266-7235
vinay.jepak@commerzbank.com

June 16, 2011

Re: Information Sharing – Stratus International Contracting Company

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of HypoSwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Ciudad Ojeda, Estado Zulia, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller
Board of Managing Directors: Martin Blessing (Chairman),
Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,
Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main
Registered Office: Frankfurt am Main Reg.No. 32000
VAT No. DE 114 103 514



NEW YORK BRANCH

Re: Information Sharing – Stratus International Contracting Company– Page 2

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG
New York Branch

A handwritten signature in green ink, appearing to read "Deepa Keswani".

Deepa Keswani
Head of AML/Anti-Fraud/Sanctions Compliance

A handwritten signature in blue ink, appearing to read "Vinay Jepal".

Vinay Jepal
Sanctions Compliance Officer

Encls.

stratus intl payment

: LT Address : COBAUS3XA
 : transaction type : 202 COVER bank tfr favour 3rd bank
 : input from : COBADEFF
 COMMERZBANK AG FRANKFURT
 HEAD OFFICE
 32-36 NEUE MAINZERSTRASSE
 60261 FRANKFURT GERMANY
 : Validation Flag : COV}

 {4: Text block:
 : 20 /transaction reference number : FAAS109400150500
 : 21 /related reference : FAAS109400150500
 : 32A/value date : 040411 USD 29, 442, 967. 57
 : 52A/ordering institution - BIC : COBADEFF
 COMMERZBANK AG
 FRANKFURT AM MAIN
 : 57A/account with inst - BIC : CHASUS33
 JPMORGAN CHASE BANK, N. A.
 NEW YORK, NY
 : 58A/beneficiary inst - BIC : SHHBCHZZ
 HYPOSWISS PRIVATBANK AG, ZURICH
 ZURICH
 : 50K/ordering customer : /400887746602USD
 BT/ FIDELCOMISO / FONDO CHINO
 VENEZOLANO. AV GUICAI PURO. URB EL
 ROSAL. TORRE BANCO DEL TESORO.
 CARACAS - VENEZUELA.
 : 52A/ordering institution - BIC : BDTEVECA
 BANCO DEL TESORO, C. A. BANCO
 UNIVERSAL
 CARACAS
 : 59 /beneficiary customer : /CH7708530519663100203
 STRATUS INTERNATIONAL CONTRACTING
 J. S.
 : 70 /details of payment : REF: DESEMBOLSO NRO. 386 FONDO
 CHINO VENEZOLANO. CODIGO NRO.
 00579.
 : 33B/amount : USD 29, 442, 967. 57}

 Entry : /SWIFT/ Date: 110404 Time: 02: 44: 17
 Info: 1111/001781



Stratus International
Contracting Company

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of RIs 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received **"Exemplary Exporters"** of the year 1999 from his excellency Mr. president.



- STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.

STRATUS is Graded in three major categories: [Read more...](#)

- STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)

- Our memberships:
 - Federation of Contractors of Islamic Countries (F.C.I.C.)
 - Pakistan Engineering Council
 - International Chamber of Commerce (I.C.C.)
 - Iran – UK Chamber of Commerce
 - Iran – Canada Chamber of Commerce [Read more...](#)

Road & Railway



Dam



Building





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Contact Us

STRATUS International Contracting Co.

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

Fax: **(98) 21 8808 2882**

E-mail: stratus@stratusgc.com

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Branch Offices

Middle East
Iran
Iraq

CIS
Kazakhstan

South America
Venezuela

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Sister Companies List



1. Samaneh Stratus (INVESTMENT CO.)



2. Iran Construction Investment Co.



3. Eghtesad - Novin Bank

4. Pishgaman Bazar Novin (BROKERAGE CO.)



5. Novin Insurance Co.



6. Pars Shahr Co.



7. Global Petro Tech CO.



8. Keyhan Tabadol Co.



9. Pars Hanza Aluminium CO.



10. Azarbaijan Industry Development Co.

11. Eghtesad Novin Investment CO.



12. Samaneh Gostar Novin

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7000 Units 'New Ojeda' Housing Development Project

Main Technical Features	Site Gross Area : 318 Hec. Concrete works : 520,000 m ³ Net Construction Area : 850.000 m ² Water & Sewage network : 150 Km Electrical network : 200 Km Communication network : 220 Km Gas network : 30 Km
Location	Ciudad Ojeda, Zulia State, Venezuela
Employer	Ducolsa 'Urban Development S.A'
Contract Duration	48 Months
Date of Award	September 2009
Status	[Under Construction]



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Dalbandin – Nokkundi Highway - Section III-B

[Details >>](#)



Socotra Airport

[Details >>](#)



Design & Construction of Parliament Building & Commercial Center in Djibouti City

[Details >>](#)



7000 Units "New Ojeda" Housing Development Project

[Details >>](#)

(K A D I K Ö Y)
370857 - 2010T.C.
İ S T A N B U L
Ticaret Sicil Memurluğu

S İ C İ L T A S D İ K N A M E S İ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber,merkezin adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükmi şahsın mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.1u CELAL TATLICIBAŞI
Tasdiknamenin düzenlenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKMEN
İSTANBUL TİCARET SİCİLİ
MEMURU YARDIMCISI